



**Commission Chair**

Scott Haggerty, Supervisor - District 1

June 25, 2013

**Commission Vice Chair**

Rebecca Kaplan,  
City of Oakland Councilmember

California Air Resources Board

1001 I Street

Sacramento, CA 95814

**ACTransit**

Elsa Ortiz, Director

**Alameda County**

Supervisors

Richard Valle - District 2

Wilma Chan - District 3

Nate Miley - District 4

Keith Carson - District 5

Dear Chairman Nichols and Members of the Board,

The Alameda County Transportation Commission (Alameda CTC) respectfully submits the following comments in support of the Association of Bay Area Governments' (ABAG) and Metropolitan Transportation Commission's (MTC) Draft Sustainable Communities Strategy (SCS) titled Plan Bay Area. The Alameda CTC wishes to express its support for the process by which the Draft Plan was developed, the projects and programs contained in the Draft Plan, and the methodology used by ABAG and MTC to determine whether greenhouse gas reduction targets will be achieved.

**BART**

Thomas Blalock, Director

The Draft Plan represents three years of dialog and work with a diverse number of representative groups, including local jurisdictions, counties and advocates. As the Bay Area's first SCS, it represents a significant achievement in meeting greenhouse gas reduction targets while respecting the legislative mandate for local land use control. The Draft Plan's Project Alternative is the one alternative that is the most vetted and understood by Bay Area residents, the most consistent with local and countywide plans, and the most comprehensive in addressing the needs of all transportation modes and users while remaining environmentally sound and beneficial.

**City of Alameda**

Marilyn Ezzy Ashcraft, Vice Mayor

**City of Albany**

Peggy Thomsen, Mayor

**City of Berkeley**

Laurie Capitelli, Councilmember

**City of Dublin**

Tim Sbranti, Mayor

**City of Emeryville**

Ruth Atkin, Councilmember

**City of Fremont**

Suzanne Chan, Councilmember

**City of Hayward**

Marvin Peixoto, Councilmember

**City of Livermore**

John Marchand, Mayor

**City of Newark**

Luis Freitas, Councilmember

**City of Oakland**

Larry Reid, Vice Mayor

**City of Piedmont**

John Chiang, Mayor

**City of Pleasanton**

Jerry Thorne, Mayor

**City of San Leandro**

Michael Gregory, Vice Mayor

**City of Union City**

Carol Dutra-Vernaci, Mayor

Of the five alternatives analyzed in the Draft Environmental Impact Report (DEIR) for Plan Bay Area, the DEIR identified Alternative 5, the Environment, Equity and Jobs Alternative as the "environmentally preferred alternative". However, it is very important to note that the performance differences between the Project Alternative and the other alternatives are minimal. Furthermore, while some alternatives perform better than the Project Alternative on some measures, they perform worse on others. For example, the DEIR states that the Project Alternative results in the lowest vehicle miles traveled per capita and has a lesser impact on agricultural and open space conversion than other alternatives.

Even more importantly, when it comes to the likelihood that greenhouse gas reduction targets will actually be achieved within the given timeframe, the feasibility of implementing a given alternative is critical. The DEIR raised serious concerns about the feasibility of implementing key aspects of certain alternatives.

**Executive Director**

Arthur L. Dao

Lastly, the Project Alternative has been developed with significant public and stakeholder input; it is consistent with Alameda CTC's current transportation policies, goals and objectives; and it incorporates the programs and projects

from the Alameda CTC's Countywide Transportation Plan and Transportation Expenditure Plan. It also is the most consistent with local land use plans and zoning regulations.

Moreover, the minimal differences in performance among the alternatives combined with the infeasibility of implementing some of the key components of the other alternatives, such as implementation of a vehicle-miles-traveled tax and modifying responsibility for local land use control, demonstrates that the Project Alternative provides overall, substantive benefits in meeting the goals and objectives of the SCS and in many cases performs better than the other alternatives.

The development of the SCS has marked a sea change in how the San Francisco Bay Area region addresses transportation planning and funding, its interrelationship with land use planning and development, and its effects on our environment, our economy and social equity. Can we do even better in the future? Should the questions that are being raised about providing more transit and housing, potential displacement, and the location of future job growth be addressed? While the answer to all of these questions is yes, we must also acknowledge our current constraints and the urgent need to move forward with a fully vetted and implementable SCS that will enable us to achieve our greenhouse gas reduction targets within the given timeframe.

ABAG and MTC have already developed recommendations for improving the performance of the Draft Plan in response to comments from the public, stakeholders, and local governments. We look forward to working with our regional agencies as well as others at the table to continue addressing important issues and questions such as the relationship between housing and job location, how Cap-and-Trade funds should be directed, ways to improve the next federal transportation funding cycle, and how to better provide affordable, sustainable and efficient transportation in the Bay Area. Thank you for your consideration.

Sincerely,



ARTHUR L. DAO  
Executive Director

cc: Alameda CTC Commissioners  
Alameda County Technical Advisory Committee  
Beth Walukas, Deputy Director of Planning, Alameda CTC  
Tess Lengyel, Deputy Director of Policy, Public Affairs and Legislation  
Steve Heminger, Executive Director, MTC  
Ezra Rapport, Executive Director, MTC  
Ken Kirkey, Director of Planning, MTC  
Miriam Chion, Planning and Research Director, ABAG